

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 16-30083-MJR
vs.)	
)	
MICHAEL J. DRESSEL,)	
)	
Defendant.)	

STIPULATION OF FACTS

Plaintiff and Defendant hereby agree and stipulate as follows:

1. In or about January, 2016, Defendant Timothy J. Stewart agreed to accept a package from Defendant Michael J. Dressel; Stewart knew that the package would contain a mixture and substance containing crystal methamphetamine (also known as "ice").
2. On January 12, 2016, Dressel caused such a package to be mailed from Phoenix, Arizona, to Stewart in Pocahontas, Illinois, which is within the Southern District of Illinois. The package was mailed via Express Mail. Dressel knew that the package contained approximately 854.6 grams of a mixture and substance containing crystal methamphetamine ("ice"). The package in fact contained approximately 854.6 grams of a mixture and substance containing crystal methamphetamine ("ice"). Although the package was addressed to a person with initials "T.B.," Stewart and Dressel intended that Stewart would be the actual recipient.
3. On or about January 14, 2016, inspectors from the U.S. Postal Service in St. Louis, Missouri, identified the package as a suspicious package and obtained a search warrant for the

package. Upon executing a search pursuant to the warrant, the inspectors found the aforementioned mixture and substance containing crystal methamphetamine (ice). Inspectors then executed a controlled delivery of the package to the address on the mailing label in Pocahontas, Illinois.

4. On or about January 15, 2016, Stewart picked up the package at the place of intended delivery and was then arrested by inspectors.

5. Stewart knowingly and intentionally possessed the aforementioned mixture and substance containing crystal methamphetamine (ice), and at the time of his possession of it, Stewart intended to deliver the package to Dressel. Stewart knew that the package contained a mixture and substance containing crystal methamphetamine (ice), and he knew that it was a controlled substance.

6. Dressel promised to pay Stewart \$1800 and a small, user amount of crystal methamphetamine (ice) for obtaining the package and delivering it to Dressel.

7. Dressel committed the following acts, each of which constituted a substantial step toward the completion of the offense charged in Count 1 of the Indictment – that is, Possession with Intent to Deliver Methamphetamine:

A. Between on or about January 12, 2016, and on or about January 17, 2016, Dressel traveled from Phoenix, Arizona, to the Southern District of Illinois, with the intention of obtaining from Stewart the package containing a mixture and substance containing crystal methamphetamine (ice).

B. On or about January 14, 2016, Dressel texted Stewart, instructing Stewart: “Be smart tomorrow. Remember return to sender.”

C. On or about January 15, 2016, by means of a cellular telephone, Dressel

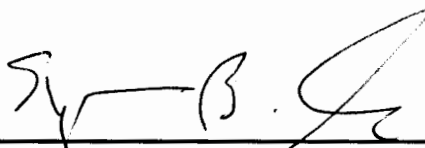
informed Stewart that he was traveling from Phoenix, Arizona, to Illinois, and planned to pick up the package at Stewart's residence within 24 hours.

D. On or about January 15, 2016, by means of a cellular telephone, Dressel instructed Stewart to write "Return to Sender" on the package and to leave the package near the front door of Stewart's residence.

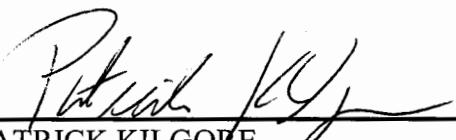


MICHAEL J. DRESSSEL
Defendant

DONALD S. BOYCE
United States Attorney



STEPHEN B. CLARK
Assistant United States Attorney



PATRICK KILGORE
Attorney for Defendant

Date:

5/5/17

Date:

5/5/17